

**UNITED STATES DISTRICT COURT  
FOR DISTRICT OF ARIZONA**

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IN RE: BARD IVC PRODUCTS LIABILITY  
LITIGATION

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MDL-15-02641-PHX-DGC

JUDGE DAVID G. CAMPBELL

This document relates to:

*Martin v. C R Bard Incorporated et al*

Case No. 2:16-cv-02135

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**MOTION TO WITHDRAW AS COUNSEL OF RECORD**

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COMES NOW, Matthew McCarley, as counsel of record and moves on behalf of Fears |  
Nachawati, PLLC, to withdraw from the representation of Plaintiff, Patrick Martin. In support  
of this motion, the undersigned states as follows:

1. Plaintiff's Counsel and Plaintiff have discussed the direction of the case and Plaintiff's Counsel and Plaintiff disagree on the direction of the case.
2. To date, Plaintiff's Counsel and Plaintiff have not been able to agree on the direction of the case and as such good causes exists for filing the present Motion.
3. Plaintiff's last known mailing address and last known telephone are listed below.

Patrick Martin  
8300 SW 44 Court  
Davie, FL 33328  
(863) 589-8314

4. Written notice of the filing of this Motion and proposed Order will be sent to the Plaintiff at the address below via Certified Mail Return Receipt Requested 7015 3010 0001 7504 7830:

Patrick Martin

8300 SW 44 Court  
Davie, FL 33328

WHEREFORE, the undersigned respectfully requests on behalf of Fears | Nachawati, PLLC, the Court grant their motion to withdraw as counsel of record in this matter.

Dated: July 21, 2017

Respectfully Submitted,

/s/Matthew R. McCarley  
Matthew R. McCarley

Fears | Nachawati Law Firm  
Matthew R. McCarley  
Texas State Bar Number 24041426  
4925 Greenville Ave., Suite 715  
Dallas, Texas 75206  
Telephone: (214) 890-0711  
Facsimile: (214) 890-0712

***ATTORNEYS FOR PLAINTIFF  
PATRICK MARTIN***

**CERTIFICATE OF SERVICE**

This is to certify that on July 21, 2017 I transmitted the foregoing Certificate of Service to the Clerk of the Court using the ECF System for filing and transmittal Notice of Electronic Filing to all ECF registrants and a copy of same has been sent via Certified Mail, Return Receipt Requested to plaintiff at the following address:

**CM/RRR #** 7015 3010 0001 7504 7830

Patrick Martin  
8300 SW 44 Court  
Davie, FL 33328

/s/ Mathew R. McCarley